

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>JAMES EARL CRENSHAW,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 2:07-cv-00793-MHT-CSC</b>
	)	
<b>COOSA COUNTY JAIL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' MOTION FOR LEAVE TO SUPPLEMENT RECORD**

COME NOW Sheriff Terry Wilson and Lieutenant David Stover, the Defendants in the above-styled cause, and submit this Motion for Leave to Supplement their Special Report with additional documents from the Plaintiff's inmate file. As grounds for so moving the Defendants state as follows:

1. Defendants filed their Special Report on October 8, 2007.
2. Attached as Exhibit E to the Special Report was a copy of the Plaintiff's inmate file. The records in Exhibit E were current at the time of the filing of the Special Report.
3. Since October 8, 2007, the Plaintiff has received additional medical treatment, and he has been the subject of various disciplinary reports, all of which is reflected in the additional records in the Plaintiff's inmate file. These records have a direct bearing on the validity of the claims in the Plaintiff's Complaint.
4. Attached to this Motion are all the additional documents that have been placed in the Plaintiff's inmate file to date since the filing of the Defendants' Special Report, including all medical records, all inmate requests, all grievance forms,<sup>1</sup> and all disciplinary reports. These

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<sup>1</sup> Notably, as discussed in the Special Report, the Plaintiff has failed to file a single grievance form, as required by the Coosa County Jail grievance policy, regarding *any claim in his Complaint*.

documents should supplement the documents attached to Exhibit E of the Defendants' Special Report.

5. The Plaintiff will not be prejudiced by this supplementation.

WHEREFORE, PREMISES CONSIDERED, the Defendants respectfully request that this Court grant their Motion for Leave to Supplement the Record by supplementing Exhibit E to their Special Report with the documents attached to this Motion as Exhibit A.

Respectfully submitted this 29th day of January, 2008.

**s/Joseph L. Hubbard, Jr.**  
JOSEPH L. HUBBARD, JR., Bar Number HUB015  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 29th day of January, 2008, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that I have mailed a true and correct copy of the foregoing by United States Mail, postage prepaid, to the following non-CM/ECF participant:

James Earle Crenshaw  
Coosa County Jail  
P. O. Box 279  
Rockford, Alabama 36420

**s/Joseph L. Hubbard, Jr.**  
OF COUNSEL

## **EXHIBIT A**

## RELEASE PROCEDURE CHECKLIST

**NOTE: ANY INDIVIDUAL BEING RELEASED ON DOMESTIC VIOLENCE AND OR CRIMES AGAINST ANOTHER PERSON IS TO HAVE CONDITIONS OF RELEASE FORM FILLED OUT.**

<input checked="" type="checkbox"/>	RELEASE FROM BLOODHOUND. (MAKE SURE INMATE TURNS IN ALL JAIL PROPERTIES).
<input checked="" type="checkbox"/>	TAKE OUT OF BOOKING BINDER (GREEN JAIL BOOK).
<input type="checkbox"/> NA	COPIES OF BOND, RELEASE ORDERS AND/OR RECEIPTS FROM THE CLERK'S OFFICE PLACED IN THEIR FOLDER AND ORIGINALS PLACED IN JAIL PAPERWORK BASKET.
<input checked="" type="checkbox"/>	JAIL RELEASE FORM FILLED OUT AND PLACED IN THE JAIL PAPERWORK BASKET.
<input type="checkbox"/> NA	PLACE CONDITIONS OF RELEASE AND/OR SEX OFFENDER FORM IN FOLDER (IF REQUIRED).
<input checked="" type="checkbox"/>	SENT TO OFFICE (JOAN OR SHEILA) TO TAKE MONIES OFF BOOKS.

CO'S SIGNATURE: \_\_\_\_\_

DATE: 01/25/18

**PLACE CHECKLIST ON LEFT SIDE OF BOOKING  
FOLDER.**

**PATIENT HISTORY REPORT**

Coosa County Family Dentistry

**Date:** 01/08/2008**Page:** 1**Patient Name:** James E Crenshaw  
P. O. Box 10  
Rockford, AL 35136**Chart Number:**CR0060**Billing Type:** 1

DATE	TEETH	DESCRIPTION	PATIENT	CHARGE	PAYMENT	BALANCE
12/30/2007		Patient Balance Forward	James	0.00		0.00
01/08/2008	15	Intraoral-periapical-1st film	James	15.00		15.00
01/08/2008	15	Extraction -single tooth	James	85.00		100.00

**TOTAL PATIENT BALANCE AS OF 01/08/2008:**

100.00

**COOSA COUNTY JAIL**  
**INMATE DISCIPLINARY REPORT**  
(PLEASE PRINT ALL INFORMATION)

NAME OF INMATE: CRENSHAW, J DATE: 12/31/07

DATE OF OCCURRENCE: 12/31/07

CORRECTION OFFICER ON DUTY: COWART/MANELL

INCIDENT: CRENSHAW HAD HIS MAT OUT BANGING IT  
ON THE FLOOR, MANELL ADVISED HIM TO QUIT.

- Mats arent allowed in the dayroom -

RECEIVED BY: Mull DATE: 1/3/8

REVIEWED BY:

ADMIN MULL: X LT PEOPLES: \_\_\_\_\_ SGT JACKSON: \_\_\_\_\_

DATE:

ACTION TAKEN:

NO visitation For 1 week

**COOSA COUNTY JAIL**  
**REQUEST FORM**  
(PLEASE PRINT ALL INFORMATION)

NAME OF INMATE: James E. Crenshaw DATE: 12-25-07

PLEASE CHECK ONE OF THE FOLLOWING:

☒ MEDICAL ☐ COMMISSARY ☐ OTHER

STATE YOUR REQUEST:

I need to go to the dentist.  
I have a tooth that needs  
to be pull had.

Thank you

James Crenshaw

RECEIVED BY: Gordon DATE: 12/25/07

REVIEWED BY:

ADMIN MULL:            LT PEOPLES:  DATE:           

ACTION TAKEN:

Make Appt.

Appt. Made 1/8/08 8:00

## INMATE DISCIPLINARY FORM

INMATES NAME: JAMES CRENSHAW / DAVID NORMAN

OFFICER ON DUTY GORDON

DATE OF OCCURANCE: 10/16/07

INCIDENT: AT APPROXIMATELY 2155 HRS. -  
I OBSERVED INMATES CRENSHAW AND NORMAN  
LOCKED UP WITH EACH OTHER - SOME  
PUNCHES WERE THROWN. - THEY WERE IN AND  
OUT OF MY LINE OF SIGHT. I TOLD ALL  
BLOCKS TO LOCKDOWN AND CALLED CO.  
TURNER TO TOWER. - ALTERCATION  
ENDED AND I WENT INTO BLOCK  
TO QUESTION INMATES. BOTH STATED  
THEY WERE HOUSEPLAYING AND GOT OUT  
OF HAND. NORMAN HAD NO SIGNS OF  
INJURY. CRENSHAW HAD A CUT UNDER  
EYE ON HIS RIGHT CHEEK. I CLEARED  
HIS CUT WITH ALCOHOL AND GAVE HIM  
BACITRACIN OINTMENT AND BAND-AIDS. - ALSO  
GAVE HIM ICE PACK FOR SWELLING. - WILL  
WATCH HIM PERIODICALLY. - MAY NEED STITCHES.  
CRENSHAW STATED HE GOT CUT ON BENCH  
IN DAYROOM. -

ACTION TAKEN: RECOMMEND THESE INMATES  
BE SEPARATED TOMORROW. - IN A.M.

REVIEWED BY: \_\_\_\_\_

OFFICERS SIGNATURE AND CALL NUMBER:

GORDON - 2247